

From: [Phillip Winsor](#)
To: [Gary Moore/R6/USEPA/US@EPA](#)
Subject: Re: Removal Action Workplan Attached
Date: 06/21/2011 03:25 PM

Gary;
I understand. Thanks for the clarification.

Phillip Winsor, PE
Superfund Section
Remediation Division
TCEQ
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>>> <Moore.Gary@epamail.epa.gov> 6/21/2011 2:36 PM >>>
Phillip:

We can discuss this further if they decided they want to do this as an option. If EPA were doing the cleanup, we would not have to get a permit or approval to do such activity because it is being done on-site. A PRP does not have the same authorizations. They would have to get whatever permits that would normally be required by the State or Federal Government. In addition, EPA would have to determine that it was an option we would even allow them to do. I hope this is clear. We have not determined that this is something we would allow them to do but I am not necessarily opposed to them doing something like this.

Thanks

Gary Moore
Federal On-Scene Coordinator
EPA Region 6
Cell: 214-789-1627
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email: moore.gary@epa.gov

From: "Phillip Winsor" <Phillip.Winsor@tceq.texas.gov>
To: Gary Moore/R6/USEPA/US@EPA
Date: 06/21/2011 11:37 AM
Subject: Re: Removal Action Workplan Attached

Gary;
Thanks, just curious because insitu bioremediation at LPST sites has occurred for diesel and waste oils (semi-volatiles). Landfarms are not uncommon, and thought that was an option based on the workplan. I know they are having to go through TCEQ for wastewater discharge permit.

Thanks again.



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>>> <Moore.Gary@epamail.epa.gov> 6/21/2011 10:55 AM >>>
Phillip:

NORCO has never requested to put in a bioremediation cell. They put that in there because they thought they may need to request that for any oily contaminated soils. They would have had to have gotten approval from the State to put such cell in place.

Thanks

Gary Moore
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From: "Phillip Winsor" <Phillip.Winsor@tceq.texas.gov>
To: Gary Moore/R6/USEPA/US@EPA
Date: 06/21/2011 09:34 AM
Subject: Re: Removal Action Workplan Attached

Gary;
I've had a chance to look over the RAWP and don't have any comments in general. However, I'm wondering if a bioremediation cell for soils has been established at the site, or if that decision has been made yet?

Again, thanks for the head's up. Please continue to keep me in the loop. I'd appreciate being cc'd on future correspondence/proposed work plans, etc.

Sincerely;

Phillip Winsor, PE
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>>> <Moore.Gary@epamail.epa.gov> 6/20/2011 12:28 PM >>>
Phillip:

Attached is the plan. There have been some changes that are not reflected in the plan.

1. The liquid is being transferred into Tank 30 from the other tanks;
2. They are pursuing a land application permit through you guys to deal with the water phase;
3. They are going to deal with any oil by having it go to an oil recycler pending required sampling;

Thanks

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----- Forwarded by Gary Moore/R6/USEPA/US on 06/20/2011 12:12 PM -----
From: "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>
To: Gary Moore/R6/USEPA/US@EPA
Cc: Richard Bergner <rbergner@rflaw.net>
Date: 05/09/2011 11:38 AM
Subject: typo

Gary,

I corrected the typo, thanks. We're nearly done gauging the tanks today and we're in the process of contracting tankers to take the waste to Texas Molecular.

Stephen Halasz P.G.
Program Manager



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